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UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

FREEDOM FROM RELIGION	:	
FOUNDATION, INC.,	:	
	:	
Plaintiff,	:	Civil Action
	:	No. 1:12-cv-00536-CCC
v.	:	
	:	(Conner, J.)
REP. RICK SACCONE,	:	
CLANCY MYER,	:	
and	:	
ANTHONY FRANK BARBUSH,	:	
	:	
Defendants.	:	

**UNOPPOSED MOTION FOR ENLARGEMENT
OF TIME TO RESPOND TO MOTION TO DISMISS
AND FOR LEAVE TO EXCEED BRIEF PAGE LIMITATIONS**

Plaintiff, Freedom From Religion Foundation, Inc., moves for an
enlargement of time to file its brief in opposition to the Motion to Dismiss by

Defendants and for Defendants to file their reply brief, and for enlargement of page limitations, and in support of this motion states as follows:

1. The Defendants' Motion to Dismiss was filed on May 25, 2012.

2. Plaintiff plans to file a brief in opposition to the Motion to Dismiss.

Plaintiff's brief is currently due to be filed by June 8, 2012, and Defendants' reply brief is due to be filed by June 22, 2012.

3. Given the numerous complex issues presented by Defendants' Motion, and due to a period of intervening out-of-state business travel by lead counsel, Plaintiff seeks leave to file its brief in opposition on or before June 15, 2012, and agrees that Defendants may file their reply brief on or before July 6, 2012.

4. Plaintiff also seeks leave to file a brief that exceeds the page limits of the Court's Local Rules, i.e., Plaintiff's brief shall not exceed 20 pages, and Defendants' reply brief may also be as many as 20 pages in length.

5. Counsel for Defendants has agreed to this request and does not oppose this motion.

WHEREFORE, Plaintiff, Freedom From Religion Foundation, Inc., respectfully requests that an Order be entered enlarging its time to respond to the Defendants' Motion to Dismiss up to and including June 15, 2012, and enlarging Defendants' time to reply to July 6, 2012. Plaintiff also requests an Order

enlarging the limit to 20 pages each for Plaintiff's brief in opposition and Defendants' reply brief.

Dated: June 5, 2012

/s/ Lawrence M. Otter

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/s/Richard L. Bolton

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CERTIFICATE OF CONCURRENCE

Counsel for Plaintiff, Freedom From Religion Foundation, Inc., hereby certifies in accordance with Local Rule 7.1 that counsel has sought and obtained the concurrence of Defendants with respect to the foregoing Unopposed Motion for Enlargement of Time and Brief Page Limitation.

/s/ Richard L. Bolton
Richard L. Bolton

CERTIFICATE OF SERVICE

I, Richard L. Bolton, hereby certify that on June 5, 2012, a true and correct copy of the foregoing Unopposed Motion for Enlargement of Time to Respond to Motion and For Leave to Exceed Brief Page Limitations was filed electronically, where it is available for viewing and downloading from the ECF system by the following:

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and	:	
ANTHONY FRANK BARBUSH,	:	
	:	
Defendants.	:	

ORDER

AND NOW, this _____ day of June, 2012, upon consideration of the Unopposed Motion for Enlargement of Time and Page Limitation by Plaintiff, the Motion is GRANTED, and Plaintiff shall file a response to the Defendant's Motion to Dismiss by June 15, 2012, and Defendant shall file a reply brief no later than July 6, 2012, each brief not to exceed 20 pages.

Christopher C. Conner, J.

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